FILED
2023 Apr-12 AM 08:03
U.S. DISTRICT COURT
N.D. OF ALABAMA

# **EXHIBIT A**

# Case 3:23-cv-00464-CLS, Document 1-1, Filed 04/11/23 Page 2 of 29

#### **PREPARED FOR: DAVID SMITH**



County: **33** Case Number: **CV-2023-900034.00** Court Action:

Style: GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL

**Real Time** 

Date:	Time	Code	Comments	Operator
8/8/2023	1:43 PM	ECOMP	COMPLAINT E-FILED.	BOW037
/8/2023	1:44 PM	FILE	FILED THIS DATE: 03/08/2023 (AV01)	AJA
8/8/2023	1:44 PM	EORD	E-ORDER FLAG SET TO "Y" (AV01)	AJA
/8/2023	1:44 PM	ASSJ	ASSIGNED TO JUDGE: BRIAN P HAMILTON (AV01)	AJA
/8/2023	1:44 PM	SCAN	CASE SCANNED STATUS SET TO: N (AV01)	AJA
/8/2023	1:44 PM	TDMN	BENCH/NON-JURY TRIAL REQUESTED (AV01)	AJA
8/8/2023	1:44 PM	STAT	CASE ASSIGNED STATUS OF: ACTIVE (AV01)	AJA
3/8/2023	1:44 PM	ORIG	ORIGIN: INITIAL FILING (AV01)	AJA
3/8/2023	1:44 PM	C001	C001 PARTY ADDED: MILLS GAYLA HAMILTON (AV02)	AJA
/8/2023	1:44 PM	C001	INDIGENT FLAG SET TO: N (AV02)	AJA
3/8/2023	1:44 PM	C001	LISTED AS ATTORNEY FOR C001: BOWLING JEFFREY LOWE	AJA
3/8/2023	1:44 PM	C001	LISTED AS ATTORNEY FOR C001: MCREYNOLDS JOHN ANDR	AJA
8/8/2023	1:44 PM	C001	LISTED AS ATTORNEY FOR C001: HARGETT EVAN MICHAEL	AJA
3/8/2023	1:44 PM	C001	LISTED AS ATTORNEY FOR C001: DAVIS DUDLEY FRANK	AJA
3/8/2023	1:44 PM	C001	LISTED AS ATTORNEY FOR C001: NORRIS JOHN EDWARD	AJA
/8/2023	1:44 PM	C001	LISTED AS ATTORNEY FOR C001: BARNETT WESLEY WARRI	AJA
3/8/2023	1:44 PM	C001	C001 E-ORDER FLAG SET TO "Y" (AV02)	AJA
3/8/2023	1:44 PM	D001	D001 PARTY ADDED: PLAYTIKA, LTD. (AV02)	AJA
8/8/2023	1:44 PM	D001	INDIGENT FLAG SET TO: N (AV02)	AJA
/8/2023	1:44 PM	D001	LISTED AS ATTORNEY FOR D001: PRO SE (AV02)	AJA
3/8/2023	1:44 PM	D001	CERTIFIED MAI ISSUED: 03/08/2023 TO D001 (AV02)	AJA
/8/2023	1:44 PM	D001	D001 E-ORDER FLAG SET TO "Y" (AV02)	AJA
3/8/2023	1:44 PM	D002	D002 PARTY ADDED: PLAYTIKA HOLDING CORP. (AV02)	AJA
3/8/2023	1:44 PM	D002	INDIGENT FLAG SET TO: N (AV02)	AJA
/8/2023	1:44 PM	D002	LISTED AS ATTORNEY FOR D002: PRO SE (AV02)	AJA
/8/2023	1:44 PM	D002	CERTIFIED MAI ISSUED: 03/08/2023 TO D002 (AV02)	AJA
/8/2023	1:44 PM	D002	D002 E-ORDER FLAG SET TO "Y" (AV02)	AJA
/13/2023	9:19 AM	ESCAN	SCAN - FILED 3/9/2023 - CERTIFIED MAIL	MMC
/29/2023	11:59 AM	D002	SERVICE OF CERTIFIED MAI ON 03/29/2023 FOR D002	MMC
/29/2023	12:00 PM	ESERC	SERVICE RETURN	MIC



**END OF THE REPORT** 

Case 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Fige 5 GRONICALLY FILED 3/8/2023 1:43 PM

State of Alabama **Unified Judicial System** 

### **COVER SHEET CIRCUIT COURT - CIVIL CASE**

33-CV-2023-900034.00 Cas CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA 33 ANITA SCOTT, ĆLERK

Form ARCiv-93 Rev. 9/18	(Not For Do	omestic Relations Cases)	03/08/2023	Juage Code:	
GENERAL INFORMATION					
IN  First Plaintiff: Business Government	GAYLA HAMIL	DURT OF FRANKLIN COUNTY TON MILLS v. PLAYTIKA, LTD  First Defendant: Bu  Go	). ET AL		
NATURE OF SUIT: Select prin	nary cause of action	, by checking box (check only one)	that best characterize	s your action:	
TORTS: PERSONAL INJURY  WDEA - Wrongful Death TONG - Negligence: General TOWA - Wantonness TOWA - Wantonness TOPL - Product Liability/Al TOMM - Malpractice-Medic TOLM - Malpractice-Legal TOOM - Malpractice-Other TBFM - Fraud/Bad Faith/M TOXX - Other:  TORTS: PERSONAL INJURY TOPE - Personal Property TORE - Real Properly  OTHER CIVIL FILINGS ABAN - Abandoned Autom ACCT - Account & Nonmo	Vehicle  EMLD al  disrepresentation	CVRT - Civil Rights  COND - Condemnation/En  CTMP - Contempt of Cour  CONT - Contract/Ejectmen  TOCN - Conversion  EQND - Equity Non-Dama Injunction Election  CVUD - Eviction Appeal/U  FORJ - Foreign Judgment  FORF - Fruits of Crime Form  MSHC - Habeas Corpus/E  PFAB - Protection From A  EPFA - Elder Protection From A  CTLB - Quiet Title Land B  FELA - Railroad/Seaman  RPRO - Real Property	gency Subpoena/Petit ninent Domain/Right-o t nt/Writ of Seizure ges Actions/Declarato n Contest/Quiet Title/S nlawful Detainer t orfeiture xtraordinary Writ/Man abuse from Abuse eank (FELA)	of-Way  ry Judgment/ ale For Division  damus/Prohibition	
<ul><li>□ APAA - Administrative Age</li><li>□ ADPA - Administrative Pro</li><li>□ ANPS - Adults in Need of F</li></ul>	cedure Act	<ul> <li>WTEG - Will/Trust/Estate/Guardianship/Conservatorship</li> <li>□ COMP - Workers' Compensation</li> <li>✓ CVXX - Miscellaneous Circuit Civil Case</li> </ul>			
ORIGIN: F ✓ INITIAL FILIN  R □ REMANDED	G	A APPEAL FROM DISTRICT COURT  T TRANSFERRED FROM OTHER CIRCUIT COU		THER	
HAS JURY TRIAL BEEN DEMA	NDED? YES		" does not constitute a de 38 and 39, Ala.R.Civ.P, fo		
RELIEF REQUESTED:   MONETARY AWARD REQUESTED  NO MONETARY AWARD REQUESTED					
BOW037	3/8/ Date	/2023 1:43:54 PM	/s/ JEFFREY LO' Signature of Attorney/		
MEDIATION REQUESTED:					

# IN THE CIRCUIT COURT OF FRANKLIN COUNTY ALABAMA

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#### **COMPLAINT**

1. This case is brought pursuant to Section 8-1-150(b) of the Alabama Code, which allows "any other person" to recover money lost in gambling "for the use of the wife...children or ... next of kin of the loser." Ala. Code § 8-1-150(b) (emphasis supplied). As will be explained in detail below, this suit, brought by an individual for the use of those named in the statute, is not a class action pursuant to Rule 23 of the Alabama Rules of Civil Procedure. The legislature has chosen to allow any person to bring the case, and to allow the benefit to accrue to the family of the losing gamblers, whether or not that person is a proper class representative under Rule 23. It is also not a mass action under the federal Class Action Fairness Act since it is brought by one person. This suit is what is typically called a private attorney general action.

2. Defendants, collectively referred to hereafter as "Playtika," make available online games and applications across multiple platforms that are illegal games of chance, and thus gambling, under Alabama law. Such games violate Alabama law if a patron pays money for the chance to win anything of value. As will be explained below, Playtika's games allow players to win free or extended playing time, which is a thing of value under Alabama Law. Ala. Code § 13A-12-20(11).

#### PARTIES, JURISDICTION, AND VENUE

- 3. Plaintiff Gayla Hamilton Mills is an adult resident citizen of Franklin County, Alabama.
- 4. Defendant Playtika, Ltd. is a foreign corporation headquartered in Herzliya, Israel. It does business through its online gambling games in all counties in Alabama, including Plaintiff's resident county. It does not have a physical place of business in the state of Alabama.
- 5. Defendant Playtika Holding Corp. is a corporation organized under the laws of Delaware with its principal place of business in Henderson, Nevada. It does business through its online gambling games in all counties in Alabama, including Plaintiff's resident county. It does not have a physical place of business in the state of Alabama.

6. The events giving rise to this suit occurred primarily in Franklin County, Alabama, Plaintiff's resident county, making venue in this court proper under Ala. Code 6-3-7.

#### FACTUAL BACKGROUND

7. Defendants Playtika, Ltd., and Playtika Holding Corp. (collectively "Playtika") make available online games of chance in a variety of formats including, but not limited to, slot machines, other casino-style games, card games and other games of chance. Below is a typical example of such games:



8. Customers initially receive some free coins to play the games. They then spend coins to play the game. For example, on the slot type games customers spend some of their coins to spin the reels. If they lose, they lose the coins wagered. If they win, they win additional coins allowing them to play longer. When a

consumer runs out of coins entirely, they must either stop playing the game or spend real money to purchase additional coins, which can be spent in the same way.

9. Defendant collects millions of dollars in revenue each year from consumers who purchase coins in its apps and use them to play the slot machines and other games of chance found there.

#### **ALABAMA'S GAMBLING LAWS**

10. "[T]he public policy of this State, as recorded in the Constitution, is that illegal gambling is harmful." <u>Alabama v. Epic Tech, L.L.C.</u>, 323 So.3d 572, 582 (Ala. 2020). Indeed, as stated by our Supreme Court as long ago as 1888 and as recently as 2020, Alabama's judiciary has long recognized the Legislature's condemnation of the societal harm of illegal gambling:

This construction is in full harmony with the policy of the constitution and laws of Alabama prohibitory of the vicious system of lottery schemes and the evil practice of gaming, in all their protean shapes, tending, as centuries of human experience now fully attest, to mendicancy and idleness on the one hand, and moral profligacy and debauchery on the other. No state has more steadfastly emphasized its disapprobation of all these gambling devices of money-making by resort to schemes of chance than Alabama. For more than 40 years past -- we may say, from the organization of the state, with some few years of experimental leniency -- the voice of the legislature has been loud and earnest in its condemnation of these immoral practices, now deemed so enervating to the public morals.

State v. Epic Tech, LLC, 323 So. 3d 572, 582 (Ala. 2020) (quoting Johnson v. State, 83 Ala. 65, 3 So. 790, 791 (1888)).

- 11. Alabama's public policy against gambling as embodied in the Alabama Constitution is so strong that its Legislature cannot permit a game of chance involving some skill unless skill is the dominant factor, not chance. Opinion of Justices, 795 So. 2d 630 (Ala. 2001) (referencing Section 65 of the Alabama Constitution).
- 12. The Alabama criminal laws pertaining to gambling are codified at Sections 13A-12-20 through 13A-12-92 of the Code of Alabama, 1975. Section 13A-12-22(a) states "[a] person commits the crime of promoting gambling if he knowingly advances or profits from unlawful gambling activity otherwise than as a player." Section 13A-12-23 adds: "A person commits the crime of conspiracy to promote gambling if he conspires to advance, or profit from gambling activity, otherwise than as a player."
- 13. The statute also defines gambling itself. "A person engages in gambling if he stakes or risks something of value upon the outcome of a contest of chance or a future contingent event not under his control or influence, upon an agreement or understanding that he or someone else will receive something of value in the event of a certain outcome." Ala. Code § 13A-12-20(4) (1975).
- 14. As noted above, players of defendants' games pay real money to purchase coins, which they then wager in the hopes of winning more coins so that they can continue to play without making additional purchases. They make this

wager on the outcome of the spin of a slot machine or the results of other gambling games.

- 15. Under Alabama law, "something of value" specifically includes "extension of a service entertainment or a privilege of playing at a game or scheme without charge." Ala. Code § 13A-12-20(11). As a matter of law, paying money to get "coins" that one bets hoping to win more coins so as to gain the "privilege of playing at a game or scheme without charge" is gambling a thing of value in Alabama.
- 16. Alabama law also defines the term "contest of chance" to include "{a]ny contest, game, gaming scheme or gaming device in which the outcome depends in a material degree upon an element of chance, notwithstanding that skill of the contestants may also be a factor therein." Ala. Code § 13A-12-20(3). Defendants' gambling games are contests of chance under Alabama law.
- 17. As noted above, Alabama law provides a statutory civil cause of action to recover money paid and lost due to gambling. Ala. Code § 8-1-150. Subsection (b) of the statute provides:
  - (b) Any other person may also recover the amount of such money, thing, or its value by an action commenced within 12 months after the payment or delivery thereof for the use of the wife or, if no wife, the children or, if no children, the next of kin of the loser.

Ala. Code § 8-1-150(b). Plaintiff Gayla Hamilton Mills is such an "other person" with respect to every Alabama citizen who paid money to Playtika to play gambling

games within the past 12 months. The Alabama Legislature, therefore, has explicitly authorized her to bring this action to return that money to the families of the Alabamians who lost it.

18. While there is a dearth of Alabama caselaw interpreting the plain language of Section 8-1-150(b), authority from other states with similarly-worded statutes make plain that such provisions should be enforced according to their unambiguous meaning. A notable recent example is Commonwealth ex rel. Brown v. Stars Interactive Holdings (IOM), Ltd., 617 S.W. 3d 792 (Ky. 2020), where the Supreme Court of Kentucky was faced with a similar gambling recovery statute authorizing "any other person" to sue and recover for gambling losses incurred by Kentucky citizens. In that case, the state of Kentucky sued the offshore operator of an online gambling site called PokerStars. The state sought recovery of all losses by Kentucky citizens, invoking a statute very similar to Alabama's authorizing "any other person" to recover gambling losses. The defendant argued that the state was not a "person" within the meaning of the statute. The supreme court rejected that argument and reinstated the state's judgment against the defendant, reasoning that the word "any" in the phrase "any other person" "means one indiscriminately of whatever kind or class; one, no matter what one and is an indefinite pronominal adjective used to designate objects in a general way without pointing out any one in particular. By using the phrase 'any other person,' the General Assembly plainly

expressed that it meant to confer standing on *all* the kinds and classes of persons . . . *without exception*." <u>Id.</u> at 799 (internal quotations and citations omitted; emphasis supplied). Using this definition, plaintiff unquestionably has standing to represent the family of gamblers who lost money playing Defendants' games.

### THIS CASE IS NOT SUBJECT TO FEDERAL COURT JURISDICTION

- 19. This action is not a class action. The legislature authorized "any person" to bring the suit, not just a person who could meet the requirements of Rule 23.
- 20. The Alabama Supreme Court has held that when a statute authorizes "any person" to bring an action, it means what it says. See Bates v. Crane, 157 So. 3d 171, 174-75 (Ala. 2014) (interpreting statute that allowed any person to bring complaint before police board).
- 21. Instead of a class action under Rule 23, this case is what is typically called a "private attorney general action." See Smith v. Southeastern Financial Corp., 337 So. 2d. 330 (Ala. 1976) ("The Civil Worthless Check Act by using the word 'unlawful' and allowing a civil action to be maintained regardless of whether a criminal action has been instituted promotes the private Attorney General concept."). In such an action, the state or other governmental unit authorizes an individual to act on its behalf and enforce the statute in a private action to enforce a public interest. See, e.g., National Consumers League v. Flowers Bakeries, LLC, 36 F. Supp. 3d 26, 32-33 (D.D.C. 2014). In the Flowers Bakeries case, Plaintiff brought

the case, as authorized by a District of Columbia statute, on behalf of purchasers of particular types of bread, who would recover if it prevailed in the case. <u>Id</u>. at 29. Likewise, Ms. Mills brings this case as a private attorney general for the benefit of the family of Alabamians who have lost money to Playtika in illegal gambling, pursuant to Section 8-1-150, which explicitly authorizes this type of suit.

22. The United States Supreme Court has held that actions by an attorney general, no matter how many people may benefit from them, are not "mass actions" or "class actions" under the Class Action Fairness Act, and so cannot be removed to federal court. Mississippi ex rel. Hood v. AU Optronics Corp., 571 U.S. 161, 176 (2014). In Hood, the defendants argued that a case like this one was a mass action under CAFA because, even though there was a single plaintiff, 100 or more persons would benefit from a recovery in the action. Id. at 169. The Supreme Court, in a unanimous decision, rejected this argument, stating that the 100 or more persons mentioned in CAFA "are not unspecified individuals who have no actual participation in the suit, but instead the very 'plaintiffs' referred to later in the sentence—the parties who are proposing to join their claims in a single trial." Id. The Supreme Court stated: "CAFA's '100 or more persons' phrase does not encompass unnamed persons who are real parties in interest to claims brought by named plaintiffs." Id. Likewise, the federal circuit courts of appeals that have considered the issue have unanimously held that an attorney general or private

attorney general action not invoking Rule 23 or a state law counterpart is similarly not a class action with the meaning of CAFA. <u>Canela v. Costco Wholesale Corp.</u>, 071 F. 3d 845, 851 (9th Cir. 2020); <u>Mississippi ex rel. Hood v. AU Optronics Corp.</u>, 701 F.3d 796, 799 (5th Cir. 2012), <u>rev'd on other grounds</u>, 571 U.S. 161. Because a suit by the Attorney General, like a private attorney general action, has only one plaintiff, and is not brought under Rule 23 or any state law equivalent, it is not removable under CAFA. <u>Id</u>. at 176. The same is true in the case at bar.

23. Since <u>Hood</u> was decided in 2014, multiple federal courts have relied upon it to hold that private attorney general suits are likewise not covered by CAFA, and thus not removable unless the claims of the named plaintiff exceed \$75,000 dollars in controversy. <u>See, e.g., National Consumers League v. Flowers Bakeries, LLC</u>, 36 F. Supp. 3d 26, 32-33 (D.D.C. 2014); <u>Canela v. Costco Wholesale Corp.</u>, 971 F.3d 845, 853 (9th Cir. 2020). This case should likewise be heard in state court. The federal courts thus lack jurisdiction because the amount-in-controversy requirement for the named plaintiff cannot be met.

#### **CLAIM FOR RELIEF**

24. Pursuant to Section 8-1-150(b) of the Alabama Code, Plaintiff Gayla Hamilton Mills seeks recovery of all sums paid by Alabama residents to Playtika in its online gambling games during the period beginning one year before the filing of this complaint until this case is resolved.

25. Plaintiff seeks this recovery to go to the benefit of the families of the gamblers who paid the money, as required by Section 8-1-150(b).

#### PRAYER FOR RELIEF

Plaintiff respectfully prays that this court:

- 1) take jurisdiction of this cause;
- 2) following discovery, enter a final judgment against Playtika awarding to the family and next of kin of all gamblers that made payments from Alabama all money paid to play the illegal gambling games described herein;
- 3) appoint a special master to determine all proper recipients of the money at issue;
- 4) enter a permanent injunction preventing Playtika from continuing its illegal activities in Alabama;
- 5) award interest and costs; and
- 6) award any other relief to which the Court finds plaintiff and the family members are entitled.

/s/ Jeffrey L. Bowling Jeffrey L. Bowling Attorney for Plaintiff

#### **COUNSEL:**

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wbarnett@davisnorris.com
dware@davisnorris.com

### PLEASE SERVE BY CERTIFIED MAIL, RETURN RECEIPT REQUESTED:

Playtika, Ltd. 2225 Village Walk Dr., Suite 240 Henderson, NV 89052

Playtika Holding Corp. c/o Corporation Service Co. 112 North Curry Street Carson City, NV 89703

DOCUMENT 3 se 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 16 of 29





33-CV-2023-900034.00

To: JEFFREY LOWELL BOWLING jeffbrbpc@bellsouth.net

# NOTICE OF ELECTRONIC FILING

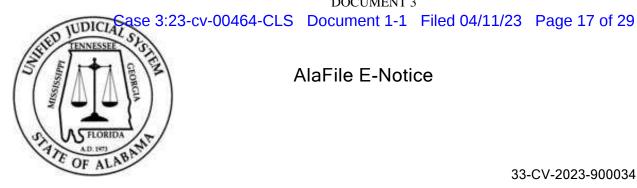
IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL 33-CV-2023-900034.00

The following complaint was FILED on 3/8/2023 1:43:59 PM

Notice Date: 3/8/2023 1:43:59 PM

> **ANITA SCOTT** CIRCUIT COURT CLERK FRANKLIN COUNTY, ALABAMA P. O. BOX 160 RUSSELVILLE, AL, 35653



#### AlaFile E-Notice

33-CV-2023-900034.00

To: PLAYTIKA, LTD. 2225 VILLAGE WALK DRIVE **SUITE 240** HENDERSON, NV, 89052

# NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL 33-CV-2023-900034.00

The following complaint was FILED on 3/8/2023 1:43:59 PM

Notice Date: 3/8/2023 1:43:59 PM

> ANITA SCOTT CIRCUIT COURT CLERK FRANKLIN COUNTY, ALABAMA P. O. BOX 160 RUSSELVILLE, AL, 35653



33-CV-2023-900034.00

To: PLAYTIKA HOLDING CORP. 112 NORTH CURRY STREET CARSON CITY, NV, 89703

# NOTICE OF ELECTRONIC FILING

IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL 33-CV-2023-900034.00

The following complaint was FILED on 3/8/2023 1:43:59 PM

Notice Date: 3/8/2023 1:43:59 PM

ANITA SCOTT CIRCUIT COURT CLERK FRANKLIN COUNTY, ALABAMA P. O. BOX 160 RUSSELVILLE, AL, 35653

Case 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 19 of 29

State of Alabama
Unified Judicial System
Form C-34 Rev. 4/2017

### SUMMONS - CIVIL -

**Court Case Number** 33-CV-2023-900034.00

Form C-34 Rev. 4/2017	- CI	VIL -			
IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL					
NOTICE TO: PLAYTIKA, LTD., 2225 VILLAGE WALK DRIVE SUITE 240, HENDERSON, NV 89052					
	1	(Name and Address of Defendant	t)		
THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OR OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), JEFFREY LOWELL BOWLING					
	-	ne(s) of Attorney(s)]			
WHOSE ADDRESS(ES) IS/A	RE: POST OFFICE BOX 66			<del>.</del>	
[Address(es) of Plaintiff(s) or Attorney(s)]  THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.					
TO ANY SHER		UTHORIZED BY THE AL. E TO SERVE PROCESS:	ABAMA RULES OF CIVIL		
You are hereby comma	inded to serve this Summ	ons and a copy of the Con	nplaint or other document in		
this action upon the abo	ove-named Defendant.				
Service by certified mai	I of this Summons is initia	ated upon the written reque	est of GAYLA HAMILTON MII	LLS	
pursuant to the Alabam	a Rules of the Civil Proce	dure.	[Name(s)]		
03/08/2023		/s/ ANITA SCOTT	By:		
(Date)		(Signature of Clerk)	(Name	e)	
✓ Certified Mail is hereby	requested.	/s/ JEFFREY LOWELL B (Plaintiff's/Attorney's Signature)			
	RETUI	RN ON SERVICE			
☐ Return receipt of certified	ed mail received in this of	fice on			
			(Date)		
☐ I certify that I personally	/ delivered a copy of this	Summons and Complaint of	or other document to		
		_in		County,	
	erson Served)	(Na	ame of County)		
Alabama on	<u> </u>				
	(Date)				
			(Address of Server)		
(Type of Process Server)	(Server's Signa	ature)			
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Case 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 20 of 29

State of Alabama Unified Judicial System Form C-34 Rev. 4/2017

### SUMMONS - CIVIL -

**Court Case Number** 33-CV-2023-900034.00

Form C-34 Rev. 4/2017	-	CIVIL -			
I	N THE CIRCUIT COL	JRT OF FRANKLIN	COUNTY, A	ALABAMA	
GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL					
NOTICE TO: PLAYTIKA HOLDING CORP., 112 NORTH CURRY STREET, CARSON CITY, NV 89703					
		(Name and Address	of Defendant)		
THE COMPLAINT OR OTHER DOCUMENT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT, AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT OF OTHER DOCUMENT, WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE PLAINTIFF(S) OR ATTORNEY(S) OF THE PLAINTIFF(S), JEFFREY LOWELL BOWLING					ED TO FILE THE COMPLAINT OR AILED OR HAND
		[Name(s) of Attorney(s)]			
WHOSE ADDRESS(ES) IS/A	RE: POST OFFICE BO				
			of Plaintiff(s) or		
THE ANSWER MUST BE MAILED OR DELIVERED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT OR OTHER DOCUMENT WERE SERVED ON YOU OR A JUDGMENT BY DEFAULT MAY BE RENDERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT OR OTHER DOCUMENT.					
TO ANY SHER	RIFF OR ANY PERSO PROCED	N AUTHORIZED B OURE TO SERVE P		BAMA RULES OF (	CIVIL
☐ You are hereby comma	nded to serve this Su	mmons and a copy	of the Comp	laint or other docum	ent in
this action upon the abo	ove-named Defendant	t.			
Service by certified mai	I of this Summons is i	nitiated upon the wi	ritten request		
pursuant to the Alabam	a Rules of the Civil Pr	rocedure.		[Nam	ne(s)]
03/08/2023		/s/ ANITA	SCOTT	By:	
(Date)		(Signature	of Clerk)		(Name)
✓ Certified Mail is hereby	requested.	/s/ JEFFREY   (Plaintiff's/Attorne		WLING	
	RE'	TURN ON SERV	/ICE		
Return receipt of certific	ed mail received in thi	s office on			
				(Date)	
☐ I certify that I personally	delivered a copy of t	his Summons and 0	Complaint or	other document to_	
		in			County,
(Name of Pe	erson Served)		(Nam	ne of County)	
Alabama on					
	(Date)				
				(Address of Server)	
(Type of Process Server)	(Server's	Signature)			
	(Server's I	Printed Name)		(Phone Number of Serv	er)

Case 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 21 of 29 CERTIFIED MAIL® RECEIPT Domestic Mail Only For delivery information, visit our website at www.usps.com !. TANKA STANK Certified Mail Fee Extra Services & Fees (check box, add fere) appropriate) \_ Return Receipt (hardcopyli **Postmark** Return Receipt (electronic) Here Cartified Mail Restricted Delivery Adult Signature Required Adult Signature Restricted Delinely Postage Total Postage and Fees Sent To See Reverse for Instructions PS Form 3800, April 2015 F\$N 7530-02-000-9047

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Case 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 22 of 29 CERTIFIED MAIL® RECEIPT Domestic Mail Only For delivery information, visit our website at www.usps.com\*. 144 Certified Mail Fee Extra Services & Fees (check box and fee as appropriate) Return Receipt (hardcopy) **Postmark** Heturn Receipt (electronic) Here Certified Mail Restricted Delivery Adult Signature Required Adult Signatum Restricted Delivery Postage Total Postage and Fees Sent To Street and Apt. No. See Reverse for Instructions PS Form 3800, April 2015 PSN /530-02-000-9047

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#### Case 3:23-cv-00464-CLS Filed 04/11/23

# SENDER: COMPANIENCE TO DA

- Complete items 1, 2, and 3
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.
- 1. Article Addressed to: 1 autika Holding Corp 112 71. Curry 5t. 89103 Carson City NV 89103



9590 9402 7887 2234 6779 95

2. Article Number (Transfer from service label)

00010640

COMPLETE THIS SECTION ON DELIVERY

A. Signature

B. Received by Milited, I

□ Agent

Addressee

C. Date of Delivery

☐ Yes D. Is delivery addiss different from item 1?

If YES, enter dislivery address below:

□No

Service Type

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☐ Collect\_on Delivery Restricted Delivery

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□ Registered Mail Restricted: Delivery

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DOCUMENT 7 se 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 24 of 29

### AlaFile E-Notice

33-CV-2023-900034.00

Judge: BRIAN P HAMILTON

To: BOWLING JEFFREY LOWELL jeffbrbpc@bellsouth.net

# NOTICE OF SERVICE

IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL 33-CV-2023-900034.00

The following matter was served on 3/29/2023

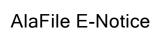
D002 PLAYTIKA HOLDING CORP.

Corresponding To

CERTIFIED MAIL

ANITA SCOTT CIRCUIT COURT CLERK FRANKLIN COUNTY, ALABAMA P. O. BOX 160 RUSSELVILLE, AL, 35653

DOCUMENT 7
se 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 25 of 29



33-CV-2023-900034.00

Judge: BRIAN P HAMILTON

To: MCREYNOLDS JOHN ANDREW IV johnmcbrbpc@bellsouth.net

# NOTICE OF SERVICE

IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

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DOCUMENT 7 se 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 26 of 29



33-CV-2023-900034.00

Judge: BRIAN P HAMILTON

To: HARGETT EVAN MICHAEL evanbrbpc@gmail.com

# NOTICE OF SERVICE

IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

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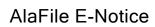
D002 PLAYTIKA HOLDING CORP.

Corresponding To

CERTIFIED MAIL

ANITA SCOTT CIRCUIT COURT CLERK FRANKLIN COUNTY, ALABAMA P. O. BOX 160 RUSSELVILLE, AL, 35653

DOCUMENT 7
se 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 27 of 29



33-CV-2023-900034.00

Judge: BRIAN P HAMILTON

To: DAVIS DUDLEY FRANK fdavis@davisnorris.com

# NOTICE OF SERVICE

IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL 33-CV-2023-900034.00

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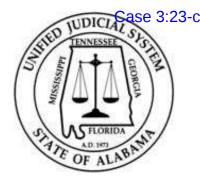
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Corresponding To

CERTIFIED MAIL

ANITA SCOTT CIRCUIT COURT CLERK FRANKLIN COUNTY, ALABAMA P. O. BOX 160 RUSSELVILLE, AL, 35653

DOCUMENT 7
se 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 28 of 29



#### AlaFile E-Notice

33-CV-2023-900034.00

Judge: BRIAN P HAMILTON

To: NORRIS JOHN EDWARD jnorris@davisnorris.com

# NOTICE OF SERVICE

IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

GAYLA HAMILTON MILLS V. PLAYTIKA, LTD. ET AL 33-CV-2023-900034.00

The following matter was served on 3/29/2023

D002 PLAYTIKA HOLDING CORP.

Corresponding To

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ANITA SCOTT CIRCUIT COURT CLERK FRANKLIN COUNTY, ALABAMA P. O. BOX 160 RUSSELVILLE, AL, 35653

DOCUMENT 7
se 3:23-cv-00464-CLS Document 1-1 Filed 04/11/23 Page 29 of 29



33-CV-2023-900034.00

Judge: BRIAN P HAMILTON

To: BARNETT WESLEY WARRINGTON wbarnett@davisnorris.com

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IN THE CIRCUIT COURT OF FRANKLIN COUNTY, ALABAMA

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